

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

MARIA ALEJANDRA CELIMEN SAVINO,  
*et al.*,

Petitioners-Plaintiffs,

v.

STEVEN J. SOUZA, Superintendent of Bristol  
County House of Corrections, in his Official  
Capacity,

Respondent-Defendant.

Case No. 1:20-cv-10617-WGY

**MOTION TO CONSIDER APPLICATION OF MARIA ALEJANDRA CELIMEN  
SAVINO FOR BAIL**

Petitioners-Plaintiffs (“Plaintiffs”) respectfully submit the attached application of Plaintiff Maria Alejandra Celimen Savino for admission to bail. Previously, Plaintiffs submitted a Motion to Add Ms. Savino to Sub-Class One, which is currently pending. *See* ECF 40. The basis for that motion was that the government had listed Ms. Savino on its spreadsheet as having criminal charges without noting that those charges were dismissed, and that, as a result, Ms. Savino was improperly excluded from “Subclass One,” during the time when the Court was evaluating applications for bail by subclasses. The government does not dispute that she has no convictions or pending charges. *See* ECF 42.

Since that time, the Court has begun proceeding with individualized determinations outside of the subclass structure, and Plaintiffs have been submitting applications for bail in a standard manner for all class members whom the Court is considering. However, because Plaintiffs' request for relief for Ms. Savino pre-dated that system, Plaintiffs did not submit all of the information concerning Ms. Savino that is now before the Court for other class members' applications for bail.

Accordingly, Plaintiffs hereby submit such information on Ms. Savino, *see* Exhibit 1 attached, to assist the Court should it wish to review Ms. Savino's request for relief as part of the now existing process.

Respectfully Submitted,

/s/ Oren Sellstrom  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on April 17, 2020 a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of this court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

Date: April 17, 2020

/s/ Oren Sellstrom  
Oren Sellstrom (BBO #569045)